

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA RUSSO, LISA BULLARD,
RICARDO GONZALES, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL 38 HEALTH AND
WELFARE FUND, INTERNATIONAL
UNION OF OPERATING ENGINEERS
LOCAL 295-295C WELFARE FUND, AND
STEAMFITTERS FUND LOCAL 439, on
Behalf of Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT AND AUTHORIZATION TO DISSEMINATE
NOTICE OF SETTLEMENT**

Plaintiffs Cynthia Russo, Lisa Bullard, Richard Gonzales (the “Individual Plaintiffs”), International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, International Union of Operating Engineers Local 295-295c Welfare Fund, and Steamfitters Fund Local 439 (the “Fund Plaintiffs,” and with the Individual Plaintiffs, “Plaintiffs”), by and through their undersigned counsel, respectfully move this Court, pursuant to Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an Order: (1) granting preliminary approval of the Settlement Agreement; (2) provisionally certifying a Settlement Class; (3) preliminarily appointing Class Counsel and Class Representatives; (4) appointing a Settlement Administrator and Escrow Agent; (5) approving the form and manner of Notice to the Settlement Class; (6) preliminarily approving the Plan of Allocation and Distribution; and (7) scheduling a Fairness Hearing, at which the Court

will consider final approval of the Settlement, certification of the Settlement Class, the appointment of Class Counsel, and the Plan of Allocation and Distribution, and Class Counsel's motion for Attorneys' Fees and Expenses and Service Awards.

This motion is based upon the Stipulation, the accompanying Memorandum of Law, the Declaration of Joseph P. Guglielmo, and all other papers and proceedings herein. The Order Preliminarily Approving Settlement and Providing for Notice is attached as Exhibit B to the Stipulation and will be emailed to the Court pursuant to the Court's Case Procedures.

Pursuant to the terms of the Stipulation, this motion is unopposed by Defendant.

DATED: November 1, 2024

/s/ Joseph P. Guglielmo

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Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo